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October 22, 2013

VIA ECF

Hon. Joseph E. Irenas, U.S.D.J.
United States District Court for the
District of New Jersey
Mitchell H. Cohen U.S. Courthouse
1 John F. Gerry Plaza
Camden, NJ 08101

**Re: *Brady, et al. v. Air Line Pilots Association*
Civil Action No. 02-2917**

Dear Judge Irenas:

With the consent of counsel for defendant Air Line Pilots Association, International, I write to inform the Court that the parties have agreed to participate in mediation before David Geronemus, a JAMS mediator located in Manhattan, New York. The first session of mediation is scheduled for November 26, 2013, which is the same date as the Final Pretrial Conference before Your Honor. Although the parties will not be requesting a stay of the litigation pending mediation, we respectfully request that the pretrial conference be rescheduled.

A status conference is scheduled before Your Honor on November 8, 2013, at which time the parties would like to address the rescheduling of the Joint Final Pretrial Conference, as well as a pretrial scheduling order that provides a time frame by which the parties shall exchange their portions of the Joint Final Pretrial Order, a date by which meet and confer shall occur and a date by which the Joint Final Pretrial Order shall be submitted to the Court.

Pending mediation, the parties also request that Your Honor not schedule oral argument or issue rulings on the *Daubert* motions filed by both parties, or the summary judgment motion filed by ALPA. Docket Nos. 568 (Plaintiffs' Motion to Exclude Expert Testimony of Experts Feltman and Levine and Limited Testimony of Murphy) and 569 (ALPA's Motion to Exclude the Testimony of Plaintiffs' Experts and for Summary Judgment). The motions were fully briefed as of October 18, 2013, but oral argument has not been scheduled.

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If Your Honor would like to address the content of this letter in advance of the November 8 status conference, Plaintiffs' counsel will gladly coordinate a conference call. We otherwise look forward to seeing you on November 8.

Respectfully submitted,

s/ Lisa J. Rodriguez

Lisa J. Rodriguez
For SCHNADER HARRISON SEGAL & LEWIS LLP

LJR/cmk

cc: Jay Cohen (*Via ECF*)
Dan Toal (*Via ECF*)
John Connell (*Via ECF*)
Daniel Katz (*Via ECF*)
Plaintiffs' Counsel (*Via ECF*)